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May 2, 2024

Hon. Lois Bloom
United States Magistrate Judge
United States District Court
Eastern District of New York
VIA ECF

Re: T.K. v. [REDACTED]
Case No.: 23 cv 5441(ARR)(LB)

Dear Judge Bloom:

I am attorney of record for defendant in the above matter. This letter serves to request a pre-motion conference regarding the parties' request to have the entire docket marked "for parties eyes only" and to amend the caption to only show the initials of defendant. As the parties previously advised the Court, they have reached a settlement agreement. The parties have agreed upon the language and defendant has already executed it. On May 2, 2024, I received the fully executed copy back from plaintiff's counsel. The parties were given until April 14, 2024, to file a stipulation of discontinuance; that has not occurred, and the Court gave the parties until April 30, 2024, to file the stipulation of discontinuance. In that order extending the time to file the stipulation of discontinuance, the Court denied the parties' joint request that the entire docket be sealed (*See*, order following Docket Entry 17).

In that order, the Court also indicated that relief less than a full sealing of the docket might be possible, including marking the file "for parties' eyes only." (*See*, order following Docket Entry 17). That request is therefore once jointly made by the parties herein.

Additionally, the parties ask that the Court amend the caption to include only defendant's initials, so that the proposed new caption to the action would then be:

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
T.K. Plaintiff

-against-

Case No.:
23cv5441(ARR)(LB)

K.N.

Defendant.
-----X

The Court did give a deadline of April 30, 2024, to request this relief, however (a) I had not yet received the signed stipulation of settlement from plaintiff's counsel; and (b) I was actually engaged in an evidentiary hearing in *People v. Ronald Plaza*, Ind.2506/2014, in the Bronx Supreme Court before the Honorable Timothy Lewis, all day on April 29, 2024, and April 30, 2024.

It is therefore respectfully requested that the Court either schedule a motion conference or treat this letter as a consent motion and grant the relief requested when the matter is discontinued.

Thank you for your attention in this matter.

Sincerely,

s/Oscar Michelen

OSCAR MICHELEN

OM:sjk